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Hall County

# Central Communications

P. O. Box 1435 / Gainesville, Georgia 30503 404-531-6759



May 28, 1993

Elaine W. Sexton  
Communications Director

Ms. Donna Searcy  
Secretary  
Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20554

Dear Ms. Searcy,

RE: PR Docket No. 92-235

Hall County Georgia presently operates over 1,500 mobile units on low band and high band frequencies. Our Public Safety Frequencies are in the 154.905 to 159.150 range.

For Hall County to comply with PR Docket No. 92-235 we would have to change 2/3 of our equipment by 1996 and all of our equipment by 2004. The cost for these changes to our existing radios/systems, would be the same as a total system change out to 800 MHZ, county wide. The immediate problem with considering 800 MHZ is that Hall County is located just north of Metro Atlanta. Atlanta currently has acquired all available 800 MHZ frequencies. This leaves Hall County no choice but to spend millions of the tax payers dollars to upgrade 40 year old technology just to comply. As a radio dependant Public Safety Department, Hall County would like to offer an alternative proposal to the current frequency spectrum problem.

It would be the hope of Hall County that the FCC would consider increasing the level of licence checking and frequency monitoring. There seems to be, especially in the Metro Atlanta area, many FCC customers that are over licensed and not properly using or loading the frequencies that they have been granted. There are just as many new 800 MHZ users that have maintained existing VHF and UHF frequencies just to use when ever needed. This practice has influenced the spectrum problem. We are sure this is a Nationwide problem, not just an isolated one.

If the FCC could participate in fulfilling their reason for existence, Hall County feels that this would free up some of the frequency congestion. This would also present time to rural counties to develop a plan for peaceful migration. If the proposed rules are passed, there will be numerous government entities forced to spend millions of dollars they do not have.

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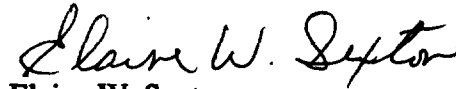
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Hall County supports the efficient use of the given frequency spectrum. We would hope that the FCC would support the many Public Safety users by giving them the time to plan a beneficial way of increasing system efficiency.

One last thought, an easy way to pay for policing the spectrum, is to charge a yearly fee on every license. This would more than cover the cost of this operation. Hall County would gladly pay this fee on all of our granted licences, just to know that the spectrum is managed.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script, reading "Elaine W. Sexton".

Elaine W. Sexton  
Communications Director

EWS/mvp